```
1
     William C. Reeves
     State Bar No.: 8235
 2
     MORALES FIERRO & REEVES
     600 S. Tonopah Drive, Suite 300
 3
     Las Vegas, NV 89106
    Telephone: 702/699-7822
 4
     Facsimile: 702/699-9455
     Email: wreeves@mfrlegal.com
 5
     Attorneys for Defendants
     Berkshire Hathaway Direct Ins. Co. and
 6
     Biberk Insurance Services, Inc.
 7
 8
                                UNITED STATES DISTRICT COURT
 9
                                       DISTRICT OF NEVADA
10
     RMC MOTORSPORTS, LLC.,
                                                    Case No.: 2:25-cv-00547-CDS-DJA
11
                   Plaintiff,
                                                    STIPULATION AND [PROPOSED]
                                                    ORDER RE: EXTENDING THE
12
                                                    DEADLINE TO RESPOND
                   VS.
13
     BERKSHIRE HATHAWAY DIRECT
                                                    (First Request)
     INSURANCE COMPANY, et al.,
14
                   Defendants.
15
           TO THE COURT:
16
           Plaintiff RMC Motorsports, LLC ("RMC") and Berkshire Hathaway Direct Ins. Co. and
17
     Biberk Insurance Services, Inc. (collectively "Berkshire"), by and through counsel, stipulate and
18
19
    agree as follows:
           WHEREAS, this matter is an insurance coverage dispute regarding benefits owing in
20
     connection with stolen property;
21
            WHEREAS, the current deadline for Defendants to respond to the suit is April 1, 2025;
22
           WHEREAS, RMC and Berkshire (collectively "Parties") desire to explore settlement in lieu
23
24
     of incurring litigation costs and expenses;
25
            WHEREFORE, the Parties, subject to this Court's approval, agree to extend the deadline for
     Berkshire to respond to the Complaint to April 22, 2025.
26
27
    ///
     ///
28
```

STIPULATION Case No.: 2:25-cv-00547

1	IT IS SO AGREED.
2	Dated: March 27, 2025
3	LEVERTY & ASSOCIATES MORALES FIERRO & REEVES
4	
5	By: /s/ Patrick Leverty Patrick Leverty By: /s/ William C. Reeves William C. Reeves
6	Patrick Leverty William C. Reeves Attorneys for Plaintiff Attorneys for Defendants
7	
8	The Court, having considered the stipulation of the Parties and good cause appearing,
9	extends the deadline for Berkshire to respond to the Complaint to April 22, 2025.
10	IT IS SO ORDERED.
11	
12	DANIEL J. ALBREGTS
13	UNITED STATES MAGISTRATE JUDGE
14	DATED: 3/31/2025
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

Case 2:25-cv-00547-CDS-DJA Document 7 Filed 03/31/25 Page 2 of 2

STIPULATION Case No.: 2:25-cv-00547